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February 6, 2006

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 12th Street, SW, Room 8B201 Washington, DC 20554

Re: Midcontinent Communications

Certification of CPNI Filing (February 6, 2006)

File No. EB-06-TC-060

Dear Ms. Dortch:

In accordance with the requirements of the Commission's February 6, 2006 *Public Notice*¹ in this matter, Midcontinent Communications hereby submits its CPNI compliance certification for its operations.

Please inform me if any questions should arise in connection with this submission

Respectfully submitted,

J.G. Harrington

Counsel to Cox Communications, Inc.

JGH/vll

Attachment

cc (w/ att.): Byron McCoy

Best Copy and Printing

¹ "Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications," *Public Notice*, DA 06-223 (rel. Jan. 30, 2006) (the "*Public Notice*").

February 6, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: CERTIFICATION OF CPNI FILING, FEBRUARY 6, 2006

Dear Ms. Dortch:

My name is Steven Grosser and I am Senior Vice President of Finance of Midcontinent Communications Investor, LLC, Managing Partner, Midcontinent Communications. I am making this certification as an agent of Midcontinent Communications and I have personal knowledge of the matters described herein. Pursuant to the requirements of Section 64.2009(e) of the rules of the Federal Communications Commission (the "FCC"), I hereby certify that Midcontinent Communications has established operating procedures that are adequate to ensure compliance with the rules in Subpart U of Part 64 of the rules of the FCC as in effect on this date.

Dated: February 6, 2006

Steven Grosser

Sr. Vice President of Finance

Midcontinent Communications Investor, LLC

Managing Partner

Midcontinent Communications

Enclosure

Midcontinent Communications CPNI Compliance 47 CFR 64.2009

Midcontinent Communications policies and procedures to meet the guidelines of CPNI include:

Marketing:

- The Director of Marketing approves all direct marketing to ensure compliance with the CPNI rules
- Marketing has safeguards to prevent cross product information sharing that would be in violation of CPNI rules
- Marketing does not sell customer lists to outside sources

Customer Service:

- Customer service has extensive training, as part of new hire training and on an annual basis, on the importance of customer confidentiality.
- Employees must sign an acknowledgement that they have been advised of and understand the importance of customer privacy every time they receive training on confidentiality.
- Customers must verify their personal account information before an employee can provide comments or take requests for any changes to an account. At a minimum, customers must provide their name, address and a password of their choice.
- Every entry into a customer account is tagged with the user name entering the account and the user is required to make comments on why the account has been opened
- Customer service representative interactions with customers are monitored for quality assurance, and the monitoring includes evaluation of compliance with privacy requirements.

Order Processing/Provisioning:

- Passwords are used to get into any of Midcontinent systems
- Every entry into a customer account is tagged with the user name entering the account
- Paper documents are microfilmed for safekeeping and paper copies are shredded

Management:

- Managers receive training on customer confidentiality on an annual basis
- Managers monitor and coach employees on maintaining customer confidentiality

Other procedures to assure compliance of CPNI rules:

- Customer privacy is a part of all job descriptions
- CPNI compliance processes are reviewed and updated annually or as regulations may require changes.
- Employee training on CPNI is done upon hiring and annually or as processes may change. Employees sign an acknowledgement at each training session.

- Compliance is monitored by managers listening to telephone conversations between employees and customers and/or monitoring data entry for any unusual activities or violation of CPNI rules.
- Compliance is part of an employee annual evaluation process. Compliance can affect employees' raises, promotions, or continued employment.